

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, et al.,  Debtors <sup>1</sup>	PROMESA  Title III  <b>Case No. 17 BK 3283-LTS</b>
In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  PUERTO RICO ELECTRIC POWER AUTHORITY,  Debtor	PROMESA  Title III  Case No. 17 BK 4780-LTS

**PARTY IN INTEREST'S PRELIMINARY FACT WITNESS LIST**

COMES NOW, PV Properties, Inc. (“PV Properties”), through its undersigned attorneys and respectfully submits its preliminary fact witness list as to the hearing on the confirmation of the Second Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority as follows:

Victor Luis González: PV Properties’ President: May provide testimony as to Puerto Rico’s public policy regarding energy and its environmental attributes associated with the

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

generation of electricity by renewable energy, as established by the corresponding legislation and PREPA's obligation to purchase from distributed generation Prosumers Renewable Energy Credits ("RECs") generated and self-consumed and those generated and exported to the Grid, including determination of the value of the RECs and PV Properties' claim against PREPA for its refusal to purchase RECs thereby; Puerto Rico Energy Bureau's jurisdiction to establish the rate to Net Meters consumers as part of PROMESA, including the rate or mechanism to compensate customers for energy supplied to the electric power grid, as well as the value of the RECs, and the Legacy Charge rate, usurped by the Oversight Board.

**WHEREFORE**, it is respectfully requested that PV Properties be deemed in compliance with the deadline for the submittal of its Preliminary Fact Witness List established by the Court.

**CERTIFICATE OF SERVICE:** We hereby certify that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

San Juan, Puerto Rico this 21<sup>st</sup> day of March 2023

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